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COMMUNITY RELATIONS PLAN

ROCKER OPERABLE UNIT

EMERGENCY REMOVAL

SILVER BOW CREEK SUPERFUND SITE

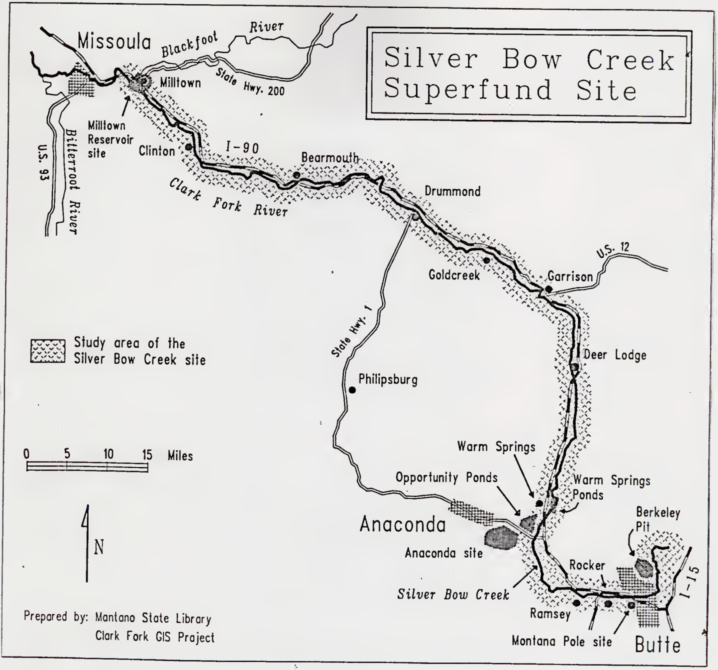
SOUTHWESTERN MONTANA

PLEASE RETURN

Montana Department of Health and Environmental Sciences
Solid and Hazardous Waste Bureau
Room B201, Cogswell Building
Helena, MT 59620
October 1989

Jan 31, 1990

NOV 27 199



Silver Bow Creek Superfund Site

Prepared by: Montana State Library
Clark Fork GIS Project

This community relations plan identifies issues of community concern regarding the Rocker Operable Unit of the Silver Bow Creek Superfund site in southwestern Montana and outlines community relations activities to be conducted during the emergency removal and subsequent investigations at that unit. This plan was prepared in accordance **Community Relations in Superfund: A Handbook, Interim Version,** Office of Emergency and Remedial Response, U.S. EPA, June 1988. The Handbook provides the framework for development of the community relations plan in accordance with the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This plan was prepared in accordance with, and is consistent with CERCLA, the NCP, and all pertinent EPA guidance. This plan will be revised as necessary, to comply with any statutory or regulatory requirements. (The reader is encouraged to refer to a summary of the requirements governing development of this plan in Appendix C.)

The purpose of the community relations plan as well as the entire program is to identify the concerns of people affected by the site, and develop methods to address those concerns. In order to develop a community relations program, the lead agency at the site, in this case MDHES, conducted community interviews and then prepared this plan for the site. The Butte/Silver Bow Health Department assisted in the interviews and in the review and preparation of this plan. The plan includes a description of the site background, history of community involvement at the site (including major community concerns), community relations objectives, a schedule of community relations activities, and a list of affected and interested groups and individuals. The interviews form the foundation for developing information to be disseminated to the public, and for determining what actions are necessary to deal with public concerns. The Handbook states that "a community relations program should not try to quell controversy, but rather strive to anticipate, identify, and acknowledge areas of conflict so that decisions can be made with full understanding of community views."

It is important to emphasize that the community relations plan presents the opinions and concerns of residents and other interviewees and not those of the

Montana Department of Health and Environmental Sciences (MDHES), EPA, or the potentially responsible party (PRP). The information developed in these interviews and summarized in the community relations plan reflects interviewees' responses, whether or not those responses are factually precise or accurately portray conditions at the site. The community relations plan serves as a basis for addressing community concerns and also for clarifying misinformation identified in community responses. The plan suggests measures for accomplishing both of these objectives.

OVERVIEW OF THIS COMMUNITY RELATIONS PLAN

This plan was prepared by MDHES, which, as lead agency is responsible for managing Superfund activities at the site and for conducting the community relations program for the site. The U.S. EPA Region VIII Montana Operations Office in Helena has a concurrence role in these activities.

The purpose of the community relations program at the site is to allow the community to learn about and participate in the Superfund process. To be effective, the community relations program must be gauged according to the community's desire for information, and its interest in participating in the Superfund process.

MDHES will conduct the community relations activities set forth in this plan to ensure the public has input into and an opportunity to participate in decisions regarding the Superfund investigative and cleanup activities to be conducted at the site. Implementation of the plan by MDHES will also keep the public well informed about site activities.

The information in this report was gathered in discussions conducted in and around Rocker in June 1989 with local officials, area residents, special interest group representatives, business people and other interested parties. The interviews were conducted informally. Residents were encouraged to expand on topics according to their own interests and experience. The information gathered during those interviews is supplemented by background gained from MDHES files and other interaction with the public and local governmental officials during community relations activities at the rest of the Silver Bow Creek site.

In general, community concern about the site and Superfund activities at the site is high. Community members have strong opinions about the activities of the Montana Department of Health and Environmental Sciences (MDHES) at the site. Many Rocker residents are interested in the site. The concerns of these different people need to be considered in the decision-making process.

SITE BACKGROUND

The Silver Bow Creek site is a 120-mile long tract of land encompassing the floodplain of Silver Bow Creek and the upper Clark Fork River from the headwaters of Silver Bow Creek to the Milltown Reservoir, about 6 miles east of Missoula. The Silver Bow Creek site is located adjacent to the Anaconda Smelter, the Montana Pole and the Milltown Dam Superfund sites. Rocker is located within the Silver Bow Creek site and is an operable unit of the site (see map). The Rocker Timber Framing and Treating facility was used to treat timbers which were used in the mines. Arsenic and creosote contamination are present from plant activities.

COMMUNITY BACKGROUND AND PLANT OPERATION

Following is a brief history of the Rocker community and the Rocker Timber Framing and Treating Plant:

From the early 1870s to the late 1970s, Butte was one of the world's most productive mining districts because of rich copper deposits under the city and surrounding area. The Butte Hill has been called "the richest hill on earth," and at one time the Berkeley Pit, at the edge of Butte, was the largest open-pit mine in the world. In addition to the open mines, it is estimated that there are approximately 4,500 miles of mining tunnels under the city.

From the late 1800s to the early 1900s, seventeen active smelters and more than 100 different mines operated in the area. After the Anaconda Smelter was constructed in 1917, all smelting took place in Anaconda. The builder of this smelter, the Anaconda Copper Mining Company (ACMC), eventually emerged as the major employer in the area and a major mining company in the country. The smelter, which is part of the Anaconda site, became a major source of aerial, ground water, and surface water contamination in the area.

Rocker is located about five miles west of Butte. Rocker was settled

primarily by Chinese immigrant miners who named the town after the rocker used in placer mining used to wash gold from gravel. The town subsequently grew around the Bluebird mine but died back when the mine shut down in 1893.

The town later revived when the Butte, Anaconda, and Pacific (BAP) railroad between Butte and the Anaconda Smelter chose Rocker as its division point. The BAP Railroad took ore from Butte to Anaconda for smelting, but only a limited number of cars at a time could be taken down the steep Butte hills. These small groups of railroad cars were gathered in Rocker and made into longer trains which then went to Anaconda. The Northern Pacific Railroad went through Rocker. Supplies for the mines were taken from the NP cars and loaded onto the BAP cars in Rocker and then taken to Butte. Likewise, timber hauled in on the NP stopped in Rocker for framing and preparation to go to the mines. The Rocker Timber Framing Plant opened in the early 1900s when the Anaconda Minerals Company decided to consolidate their timber framing and treatment operations. Timbers were brought into the mill from western Montana, primarily Bonner, near Missoula, where ACM had a sawmill and logging operation. In the Timbers were brought into the mill and "framed." Framing is the process whereby uniform cuts are made in the logs so they will fit snugly into other logs. In the early days of the mill, timbers selected for treating were treated with creosote. Unfortunately the creosote-treated timbers were flammable and contributed to the already hazardous conditions of the mines. Timbers were later treated with an arsenic solution because arsenic proved to be much less flammable. A Butte-area historian said that few timbers were treated because they were not required to last a long time. In addition, the miners disliked handling the treated timbers because they were so corrosive to the skin. Treated timbers were used in air shafts and surface sills which were expected to last a long time.

Mill operation:

The Rocker Timber Framing and Treating Plant operated until 1957 when it was torn down and abandoned. During World War II, as many as 150 workers were employed at the plant. Timbers brought to the mill were unloaded and sent to the mill first and then the framing shop or the carpenter shop. Timbers taken to framing were used to support mine tunnels. Timbers taken to the carpenter shop were cut for special purposes for the mines. The cut timbers were then

taken sent to the mines or taken to the treatment plant, commonly called the "pickler." Mine cars loaded with the timbers were run into the pickler. The pickler was sealed and the filled with the hot arsenic solution. It was then pressurized to drive the solution into the timbers. Timbers remained in the pickler for approximately 24 hours. Workers were sometimes required to go into the pickler after the excess solution had drained and lift cars back onto the tracks which had floated off during treatment.

Solution used in the pickler was mixed at the plant. Arsenic was sent to the plant from the Anaconda Smelter in large barrels weighing about 600 pounds. The fine white powder was mixed in vats into which steam was jetted. Workers were required to stir the mixture until the arsenic combined with the water, turning it blue. One man who worked at the plant said he was required to mix the solution. AMC gave these workers full-face masks which were not fit-tested, nor were the filters ever changed, he said. The steam would wet his face and the powdery arsenic would then stick to his face around the edges of the mask, causing large sores. He explained that often he would have to walk across the vats and the steam would go up his pant legs. He said the arsenic in the steam caused his testicles to become extremely swollen and painful.

The solution was piped to underground tanks where it was held until it went into the pickler. After treatment, remaining solution was piped back into the holding tanks. A grate covered the pipe into the holding tanks to filter out bark chips and other debris. A man who used to work at the plant said he had been required to clean the wet debris out of these grates with little or no protection for his hands.

Children played constantly at the plant site, according to residents. There was, and still is, no playground in Rocker, so the plant presented an inviting lure to children. The youngsters played on the small mine cars laden with arsenic dust and in other contaminated areas of the site.

When the plant was torn down in 1957, much of the equipment was taken to the Central Timber Yard in Butte, according to Rocker residents and a Butte-area historian.

Superfund activities in Rocker:

MDHES received information about areas of exceptionally high arsenic in Rocker on April 28, 1989, after Atlantic Richfield Company (ARCO) of Anaconda

submitted the findings of their sampling efforts conducted the previous summer and fall as part of the Silver Bow Creek Superfund site investigation.

On May 18, 1989, MDHES and the Butte/Silver Bow Health Department delivered door-to-door an advisory warning the public to avoid an area of Rocker found to have exceptionally high levels of arsenic. The contaminated area was found to be associated with the abandoned Rocker Timber Framing and Treating Plant. ARCO had found an area within the site containing approximately 200 to 400 cubic yards of contaminated soil and wood chips. This pile, which lies adjacent to Silver Bow Creek, appeared to consist of disposal wastes from the old treating plant. Concentrations of arsenic at this location were as high as 21 percent (214,000 parts per million). Another area of contaminted soils was also identified in the vicinity of the old treating plant complex. Concentrations of arsenic in this area were as high as two percent (20,000 parts per million). A level of .1 to 216 parts per million is considered average in soils in the northern plains region of the United States.

The advisory suggested that not only adults to stay away from the area, but also adults should make sure children did not play there or ride bikes through the area. On a recent site visit, site project manager Kathleen DeMarinis had noticed beer cans and bottles around the mounds, suggesting that perhaps people were congregating there.

A study of residential yard soils in the Rocker and Ramsay area conducted by the State Health Department during the summer of 1988 showed levels of arsenic in Rocker yards did not present an immediate threat to residents' health.

MDHES, the Butte/Silver Bow Health Department and ARCO began working immediately to begin emergency removal actions at the site. ARCO erected a fence around the worst contaminated areas, called the "hot spots" and put warning signs on the fences. The involved parties entered in discussions to plan the removal and a health study which will include blood and urine analysis.

COMMUNITY PROFILE

Rocker is a small, apparently close-knit community about five miles west of Butte, bisected by Silver Bow Creek. Rockers population is estimated at about 100 to 125 residents. Some people interviewed said they consider their town a suburb of Butte, not only because of its proximity but also because so many

Rocker residents work in Butte. Rocker has few businesses of its own and is primarily a residential area.

Another environmental issue which is of concern in Rocker currently is the possible siting of a landfill uphill of the community across U.S. Interstate 90. Residents say they fear that hazardous wastes will be illegally dumped at the landfill, threatening their groundwater. The landfill issue has caused hard feelings for some residents toward local and state government.

COMMUNITY INVOLVEMENT

All people interviewed expressed a strong interest in the Superfund activities in Rocker. Several people said they would be interested in being members of a community advisory group for Superfund activities. A town meeting held just after the discovery of the high arsenic levels drew a large crowd which filled the town meeting hall.

COMMUNITY CONCERNS

Although many of the Rocker residents have lived there all their lives and were exposed to the arsenic hot spots as children and adults, the fact that the arsenic was present became thoroughly unacceptable when MDHES released information about it. Literally overnight, Rocker residents became much more concerned about Superfund activities in the community. People who had shown little or no interest the summer before when MDHES conducted sampling in their yards, suddenly began to become involved in site issues.

People interviewed by MDHES and Butte/Silver Bow Health Department expressed strong concerns about the site and about future activities there. Following is a summary of those concerns:

* Health concerns

Health concerns were the most strongly and consistently voiced concerns during the interviews. All interviewees voiced concern about the possible implications not only to their own health but also to the health of the community's children. One resident said he is the third person in his family to have cancer, the other two having died of it. He said he could easily name at least 25 other people in Rocker who have or who have died of cancer.

Many interviewees wanted to know when blood and urine testing would begin and how the results might affect them.

Other interviewees said they were concerned about past exposures to the contaminants, not only when they were children and played at the site but also because of airborne dust from the site which they may have inhaled. They said they were concerned about the effects these exposures may have had on their health. One woman said she had trouble with past pregnancies and said she believed there is a high incidence of stillbirths and miscarriages in Rocker.

One interviewee expressed concern that one family lets their children play in Silver Bow Creek. She expressed horror at the thought of children playing their but said she would not feel comfortable telling the parents about the possible dangers.

*** Complete cleanup**

Some people interviewed said they are deeply concerned about the completeness of cleanup. One man said he wants to see the site cleaned up from the Bluebird Mine to the lagoon on the downstream side of Rocker. An interviewee expressed concern that AMC had left tanks underground at the site which may still contain arsenic solution. This same interviewee said he does not trust ARCO and wants to know MDHES will make sure the company will have to do a complete job of cleanup.

During public meetings held at the site, residents have asked ARCO to contour and revegetate any disturbed areas. They have also expressed concern that old, deteriorating buildings on site be torn down because of their potential danger to children who play there.

*** Ramifications of findings**

Many interviewees asked what might happen if they are found to have high levels of blood and urinary arsenic. They expressed concern that residents of Mill Creek had been relocated because of arsenic contamination in their community.

*** Desire for better communication from government agencies**

Most people interviewed said government agencies could do a better job of communicating with them. The interviewees cited the example of the landfill

issue and explained they thought the local and state agencies involved had not given them enough information in time to get properly involved and informed about the issue. One interviewee requested the community be sent updates about the site every two weeks if developments have occurred.

*** Concern for the safety of the Rocker water supply system**

Two interviewees expressed concern that contaminants at the site may find their way into the Rocker water supply lines which transect the contaminated area.

OBJECTIVES OF THE COMMUNITY RELATIONS PLAN

The following objectives will be kept in mind while conducting community relations for the Rocker Operable Unit of the Silver Bow Creek site:

1) Keep interested parties informed about activities at the site.

Provide information to the public during any and all stages of the Superfund process. Handle all media and public inquiries through a single, central contact with the Department of Health and Environmental Sciences. Provide all information, especially technical information, in a manner understandable to all interested parties. Make available to the public a list of repositories.

Keep local officials informed of developments and activities at the site. Most officials interviewed during the on-site discussions said they have not been kept up-to-date about the site, and expressed a desire to be kept informed of even the minor developments and activities.

2) Encourage the public to voice their opinions, concerns and questions about the site.

Public meetings should include a chance for the public to speak out or to ask questions. A comment period will be allowed at the various study and decision stages.

3) Resolve confusion about how different agencies interact at Superfund sites.

4) Remain sensitive to changes in community concerns and monitor the public

relations situation throughout the site work.

5) Provide better advance and follow-up explanations about sampling and test results to area residents.

Sampling should never be conducted unless affected residents are first notified of the upcoming activity. Follow-up, in the form of letters or direct contact should also be provided to answer further questions.

COMMUNITY RELATIONS ACTIVITIES

The techniques listed below are designed to meet the community relations objectives outlined in the previous section. Project staff must remain sensitive to community attitudes and atmosphere and revise the plan as conditions require. Following is a list of the community relations activities:

1) Citizen group meetings

Periodic information meetings should be held with the Rocker residents and other involved people, including local government. A good way to keep local government officials informed is by attending their meetings and giving them informal updates about the site. When significant developments occur, meetings will be planned to inform the public. Notification will be given two weeks before the meeting whenever possible.

2) Letters to the entire Rocker community

Most people interviewed said they like to be notified of meetings and site developments via mailings to the entire community. They said they may miss an article in the paper but would surely not miss a letter sent to them.

3) Use of the local phone tree

Two interviewees who volunteer to make calls on a local phone tree said it is an effective way to get the word out about a meeting. They said they would be happy to call residents and remind them of town meetings the day before or the day of a meeting.

4) Inserts to the water bill

The Rocker Water District said they would be willing to include inserts to the water bill which goes to Rocker residents to update them about site events.

5) Press releases

Press releases are suitable for information such as meeting announcements or smaller developments in site projects. Press releases will be prepared by the Superfund Public Information Officer (SPIO) and reviewed by the appropriate project manager, Superfund manager, and applicable supervisors. Press releases will be written in Associated Press style, inverted pyramid fashion (most important information first), and double-spaced. When applicable, at the end of the release will be a note to the editor requesting that meeting information be included also in the community calendar.

6) Public Service Announcements

Public service announcements will accompany those press releases which are sent to radio and television stations. PSAs will be used for meeting notices, workshops, the toll-free line, etc.

7) Press contact list

The SPIO will maintain and yearly update the press contact list for the site. The list will include all press contacts in the site area and will note any special instructions such as the need to put PSAs on 3 X 5 cards for certain radio stations.

8) Press meetings

Meetings with the press are especially helpful when MDHES has a large amount of information it would like to convey to the media. These meetings can be held in the afternoon before public meetings. In these press meetings the project manager can give the reporter a brief rundown of what he or she will speak about at the public meeting. The advantages of this approach, versus no meetings or a press conference, are as follows: a) The reporter has ample opportunity to ask questions and clarify points; b) taking time with the press shows them that we are interested in them and in their accuracy; c) reporters who aren't as familiar with Superfund can catch up on more basic points; d) In

these meetings, the Superfund personnel and the reporter have a chance for better one-on-one discussion. The Superfund personnel can get a better feeling for the reporter's attitude and understanding of Superfund and build a better working relationship with the press.

9) Superfund hotline

The MDHES Superfund in-state toll-free number (1-800-648-8465), or hotline, was established in June 1987 and has proven to be an effective tool for the public as well as MDHES. The public is more hesitant to call government offices when they know they will have to pay long-distance charges. The hotline eliminates this hesitancy. The MDHES community relations coordinator takes the hotline calls and responds to questions. Those questions she cannot answer are directed to the correct person, usually eliminating the phone shuffling so often encountered by the public. Calls to the hotline are monitored by the coordinator who records the date and time of the call, the question asked, the response and the time of response. Any further follow-up is also recorded. At the end of each month, the coordinator circulates her monthly report to MDHES and EPA project officers so they will be informed of what types of questions the public is asking about their sites. The hotline is in operation during business hours at MDHES.

10) Update mailing lists

A mailing list is maintained by MDHES for the site and will be updated as requests and changes are received. A form will be included on each Progress Report so interested people can mail in requests to be added, or to have their address changed.

11) Progress reports

Progress reports have taken the place of the dryly named "Fact Sheets." The term "fact sheet" implies a dry report while "progress report" implies a positive feeling of progression of events at the site. Progress reports follow basically the same format as fact sheets but information is broken down into smaller, more readable sections or "articles." More interesting headings are used on the sections to entice the reader. Progress reports are published

periodically as events occur such as test results, completion of Superfund phases, etc.

12) Make file information available to the public

In some cases the public may wish to look at open file information. Requests for specific open file information will be filled by SPIO or site project managers. Requests by the public or PRP's to view files in the office, will be channeled through the Superfund attorney. In many cases, people who request site-specific information can be directed to the administrative record for that site.

13) One-on-one contact with the public

Although public meetings are effective, they can be impersonal for some situations. One-on-one contact such as door-to-door work is especially effective for getting access permission for sampling. One-on-one contact should also be used for members of the public who show exceptional positive or negative interest in Superfund activities.

14) Accessing for sampling efforts

When MDHES and EPA need to take samples on private property, permission should be gained ahead of time. The community relations coordinator will contact the residents in person, explain what will be taking place, and ask the property owner to sign a permission form. The permission form, while a legal document, should be written clearly and concisely enough so the owner can read it and sign it while the coordinator waits. Furthermore, the owner should be able to feel comfortable with the permission form. The coordinator will make every effort to ensure that samplers will come only at convenient times for the owner. The coordinator will then provide copies of the permission forms, resident contact sheets, any necessary maps, and special instructions or requests to the personnel doing the sampling.

15) Public education

Because Superfund is such a complex program, more effort should be made to educate the public as to what it is and how it works. The public often

expresses frustration over the amount of time Superfund activities take and the number of studies necessary before cleanup begins. Some of these feelings could be assuaged with better public education. Furthermore, much of the public has little concept of what hazardous wastes are and how to protect themselves from them. Children who ride motorcycles on the tailings piles in Butte are a good example of this problem. An effective route for public education would be through the public schools at the junior high and high school levels. Several science teachers and administrators in Montana have expressed an interest in incorporating Superfund in their curriculums. MDHES could schedule a series of evening or weekend workshops for teachers and other interested citizens in Montana to educate them about Superfund in general and specifically about the sites.

16) Small group meetings

Informal small group meetings will be held when SPIO and project managers need to update smaller groups of citizens. An example of this type of group is the Butte area governmental officials. This kind of meeting provides the members with a better opportunity to ask questions and voice concerns than a large public meeting. Small group meetings can also be used to meet with Congressional aides, interest groups, etc.

17) Prepare other documents as necessary

Other various documents are required by Superfund law such as responsiveness summaries and proposed plans. These documents will be prepared by MDHES as required by law.

18) Maintain a central public information contact

The SPIO is the first-line contact person with the public in most cases. Questions and concerns which SPIO cannot respond to, she will turn over to the appropriate person.

19) Public meetings

As significant site developments occur open public meetings should be held to obtain public comments and input. Prior to the meeting, any pertinent documents should be made available for public review.

20) Update and monitor repositories

MDHES will conduct yearly inventories of the repositories to make sure they are complete. Any missing reports will be replaced. The repositories should also be evaluated as to the use they receive. If they are not being used, they should be moved to a better location. The public should be made aware of the repositories by the use of press releases and public service announcements.

APPENDIX A

SAMPLE PRESS RELEASE

DEPARTMENT OF
HEALTH AND ENVIRONMENTAL SCIENCES

STAN STEPHENS, GOVERNOR
COGSWELL BUILDING
STATE OF MONTANA
FAX # (406) 444-2606
HELENA, MONTANA 59620

Solid & Hazardous Waste Bureau
(406) 444-2821

July 6, 1989

FOR IMMEDIATE RELEASE

ROCKER PUBLIC MEETING JULY 13

HELENA -- The Montana Department of Health and Environmental Sciences (MDHES) and the Butte/Silver Bow Health Department will hold a public meeting in Rocker, Thursday, July 13 to discuss the status of the removal of arsenic "hot spots."

The meeting will begin at 7 p.m. in the Rocker Community Hall. State and local health department personnel will present information about site cleanup and investigation, as well as urine and blood screening to take place in Rocker.

In May, MDHES and Butte/Silver Bow Health Department issued an advisory to the public to avoid the old Rocker Timber Framing and Treating Plant which was found to have exceptionally high levels of arsenic. One area within the site contains approximately 200 to 400 cubic yards of contaminated soil and wood chips. This pile, which lies adjacent to Silver Bow Creek, appears to consist of disposal wastes from the old treating plant. Concentrations of arsenic at this location are as high as 21 percent (214,000 parts per million).

Another area of contaminted soils was also identified in the vicinity of the old treating plant complex. Concentrations of arsenic in this area are as high as two percent (20,000 parts per million). A level of .1 to 216 parts per million is considered average in soils in the northern plains region of the United States.

"We are still advising not only adults to stay away from the area, but to also make sure children do not play there or ride bikes through the area, Superfund site project manager Kathleen DeMarinis said. She added that pets

"AN EQUAL OPPORTUNITY EMPLOYER"

should not be allowed to roam at the site, either. DeMarinis noted that ARCO has built fences around the two known hot spots but further investigation may reveal other contaminated areas.

"We would just like people to stay out of the area of the old timber framing plant," DeMarinis added.

With state and local health department oversight, ARCO will begin cleanup work and start further site investigations this summer.

-30-

For more information, call Kathleen DeMarinis at MDHES in Helena at 444-2821 or 1-800-648-8465 or Rick Larson at Butte/Silver Bow Health Department in Butte 723-3274.

APPENDIX B

SAMPLE ACCESS FORMS

THE GREAT SEAL OF THE STATE OF MONTANA

We have completed Superfund Sampling on your property.

Thank you for your cooperation.

If you have any questions, call Janie Stiles at
1-800-648-8465 (toll-free), or 444-2821.

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES

TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

HELENA, MONTANA 59620

PERMISSION FOR ACCESS TO PROPERTY

I, the undersigned, am the owner, his representative, or otherwise control the real property at the location described below. Representatives of the Montana Department of Health and Environmental Sciences have informed me that elevated levels of heavy metals concentrations may be present at this location, and that they may be injurious to the health of persons residing on or near this property. I also understand that further investigative efforts are needed to describe the source of this contamination and define its extent in this vicinity.

I hereby give permission to Montana Department of Health and Environmental Sciences and their contractors and subcontractors, as well as their employees, agents and other designated representatives (who may include state and local agencies and their officials), to have access to my property and to undertake such investigations, monitoring, surveying, testing and other information-gathering as may be necessary.

Activities will consist of soil sampling.

I understand that the work described above may involve, among other things, disturbance of vegetation and the top few inches of soil on my property. I also understand that any disturbed vegetation will be restored to substantially the same condition as existed prior to such disturbance.

Property Address:

Signature of Owner/Occupant (all joint owners and tenants must sign):

______________________________ (Signature)   ____________ (Date)

______________________________ (Signature)   ____________ (Date)

______________________________ (Signature)   ____________ (Date)

AN EQUAL OPPORTUNITY EMPLOYER

RESIDENT CONTACT SHEET

RESIDENT NAME________________________________

ADDRESS____________________________ TELEPHONE____________

DATE__________ TIME_______ TYPE OF CONTACT*______

REMARKS

____
SPM or DESIGNATE

* T=Telephone; L=Letter; IP=In Person

DATE________
DAY________

APPOINTMENT NOTEBOOK
(Sample Page)

TIME	ADDRESS	RESIDENT	TYPE OF WORK	SUPERFUND PERSONNEL	SPM or DESIGNATE
8 A.M.					
9					
10					
11					
12 P.M.					
1					
2					
3					
4					
5					
6					
7					

QUESTIONS AND ANSWERS ABOUT THE WELL SAMPLING

WHO?

The Montana Department of Health and Environmental Sciences and their contractors, Camp, Dresser and McKee, are conducting Superfund studies in the Milltown area. Contact the following people if you have questions about the study:

Janie Stiles or Phil Hertzog in Helena
1-800-648-8465 or 444-2821

WHAT?

We will be sampling wells near the Clark Fork River in the Pinegrove area to determine if the arsenic plume in the groundwater is moving downstream from Milltown. The arsenic plume was discovered several years ago in an area underlying Milltown. This discovery led to the state and the U.S. Environmental Protection Agency installing a municipal water supply in Milltown. Studies in 1984 showed that the arsenic had not moved from the Milltown area, but as a precaution, the state has decided to re-sample wells in your area. The arsenic is coming from contaminated sediments which have been accumulating for the past 3/4 of a century. The arsenic, along with other heavy metals originally came from mining activities upstream along the Clark Fork Basin.

HOW?

Camp, Dresser and McKee will be in the Pinegrove area beginning around Oct. 31 or Nov. 1 to take the well sample. If you have a water softener, they would like to take the sample from a spigot which gets water before the softener. We need for you to run the water for approximately one-half hour before they take the sample so that any minerals or metals in the tank or in the well casing will be washed out. If you prefer, this water can be run through a garden hose and/or sprinkler so the water is not wasted. The sample can then be taken from the outside spigot. This will ensure accurate results. A representative of Camp, Dresser and McKee, probably Dennis Smith, will call you and arrange a time to take the sample. He will also tell you what date he will be there.

WHY?

The well sampling is part of a bigger study which the Montana Department of Health and Environmental Sciences is conducting in the Milltown area as part of the Superfund project. Other studies we are doing include sampling of river sediment and irrigated lands, measurements of well depth, and so on. Periodically, we will send out progress reports on site activities. Your name will automatically be added to the mailing list for these reports. If you wish to receive further information about Superfund, in general, please contact Janie Stiles at the phone number listed above.

APPENDIX C

SUMMARY OF LEGAL REQUIREMENTS GOVERNING DEVELOPMENT OF THE COMMUNITY RELATIONS PLAN

Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9601-9675 (amended 1986) to correct the nationwide public health, welfare and environmental problems caused by improperly managed hazardous substances. The United States Environmental Protection Agency (EPA) has been delegated the authority to issue regulations to "establish procedures and standards for responding to releases of hazardous substances" and to assign "appropriate roles and responsibilities for ... government."

The standards for governmental response under CERCLA are given detail and structure by the "National Oil and Hazardous Substances Pollution Contingency Plan" (NCP), 40 C.F.R. part 300, which functions as the road map for performing the necessary investigatory, analytical, and design activities to ensure that the cleanup of hazardous substances at a site is protective of public health, welfare an the environment and is cost effective.

Both CERCLA and the NCP recognize community relations as an important element in every site cleanup program. Specifically, the NCP (Section 300.67 (a)) requires the lead agency to develop and implement a formal community relations plan for response actions taken pursuant to CERCLA. CERCLA, as recently amended, augments the NCP community relations requirements by establishing mandatory public participation requirements which must be met by governmental entities involved in cleanup activities. 42 U.S.C. § 9617. This plan was prepared in accordance with, and is consistent with CERCLA, the NCP, and all pertinent EPA guidance. This plan will be revised as necessary, to comply with any statutory or regulatory requirements.

APPENDIX D

SUPERFUND CONTACTS
AND SITE REPOSITORIES

MONTANA DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES:

Director of MDHES:
Director's Office
Montana Department of Health and Environmental Sciences
Cogswell Building
Helena, MT 59620
(406) 444-2544

Solid and Hazardous Waste Bureau Chief:
Duane Robertson
Montana Department of Health and Environmental Sciences
Room B201, Cogswell Building
Helena, MT 59620
(406) 444-2821

Superfund Manager:
Vic Andersen
Montana Department of Health and Environmental Sciences
Room B201,Cogswell Building
Helena, MT 59620
(406) 444-2821

Silver Bow Creek Site Project Manager:
Kathleen DeMarinis
Montana Department of Health and Environmental Sciences
Room B201,Cogswell Building
Helena, MT 59620
(406) 444-2821

Superfund Public Information Officer:
Janie Stiles
Montana Department of Health and Environmental Sciences
Room B201, Cogswell Building
Helena, MT 59620
(406) 444-2821 or 1-800-648-8465 (in-state only)

U.S. ENVIRONMENTAL PROTECTION AGENCY, HELENA, MONTANA, OFFICE:

Project Officer:
D. Scott Brown
301 South Park
Drawer 10096
Helena, MT 59626
(406)449-5414

BUTTE/SILVER BOW GOVERNMENT:

Chief Executive:
Don Peoples
Butte/Silver Bow Courthouse
Butte, MT 59601

Director of Health Department:
Dan Dennehy
25 West Front
Butte, MT 59701

SILVER BOW CREEK SITE REPOSITORIES

Butte Public Library
106 West Broadway
Butte, MT 59701

Montana State Library
Capitol Complex
Helena, MT 59620

Grant-Kohrs Ranch National Historic Site
National Park Service Office
Deer Lodge, MT 59722

Mansfield Library
University of Montana
Missoula, MT 59812

Library
Montana Tech
Butte, MT 59701

Montana EPA Office
301 South Park
Federal Building
Helena, MT 59626

Documents Dept.
Renne Library
Montana State University
Bozeman, MT 59715

Special Rocker Repository:
Albert Molignoni
Rocker, MT